



101 Park Avenue, 17th Floor
New York, NY 10178
☎ 212.878.7900 📠 212.692.0940
WWW.FOXROTHSCCHILD.COM

DEVIN S. COHEN
Direct Dial: 212-878-7981
Email Address: DSCohen@FoxRothschild.com

July 9, 2024

VIA ECF

Honorable Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, New York 10007

Re: *Ramos v. Palm West Corp. et al*
Civil Action No.: 23-cv-09441-JMF
Letter Motion for One-Week Extension to file Answer

Dear Judge Furman:

We represent Defendants Palm West Corporation d/b/a Palm West (“Palm West”)¹ and Tryon & Stonewall Restaurant, Inc. f/k/a Landry’s Seafood House – North Carolina, Inc.² (collectively, “Corporate Defendants”) in the above-captioned matter. We write pursuant to Rule 2(D) of Your Honor’s Individual Rules to request a one-week extension (through July 18, 2024) for Corporate Defendants to file their Answer to the Amended Complaint (Dkt. 27).

On June 27, 2024, this Court granted in part Corporate Defendant’s Motion for Partial Dismissal of the Amended Complaint (Dkt. 45). Also on June 27, 2024, this Court ordered Corporate Defendants to file its Answer to the remaining claims within two weeks (July 11, 2024) (*Id.*).

Corporate Defendants are respectfully requesting a one-week extension, through July 18, 2024, to file their Answer. This is Corporate Defendants’ first request for an extension on their time to file their Answer. Our client point of contact is located in Houston, Texas. Due Hurricane Beryl, we have had difficulty communicating with our client, thus we have not been able to finalize the Answer. Plaintiff’s counsel consented to this request for a one-week extension. The parties are

¹ Incorrectly pled as Palm West Corporation d/b/a “The Palm.”

² Incorrectly pled as Landry’s Seafood House – North Carolina, Inc.

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scheduled to appear before the court on July 23, 2023 for an Initial Conference. This request will not affect any other deadlines in this case.

We thank the Court for its time.

Respectfully submitted,

FOX ROTHSCHILD LLP

/s/ Devin S. Cohen

Devin S. Cohen

cc: All counsel of record via ECF